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August 2, 2024

**VIA ECF**

Honorable Valerie Figueredo  
United States Magistrate Judge  
Southern District of New York  
500 Pearl Street  
New York, New York 10007

Re: GateGuard, Inc. v. Amazon.com, Inc. et al., Case No. 21 Civ. 09321 (JGK)(VF)  
Unopposed Letter Motion to Modify Paragraph 16  
of Proposed Second Amended Complaint.

I represent the plaintiff, GateGuard, Inc. (“GateGuard” or “Plaintiff”) in the above-captioned litigation.

On July 10, 2024, your Honor authorized the filing of Plaintiff’s proposed Second Amended Complaint (the “SAC”). Dkt. 207. Plaintiff asks that it be permitted to file the attached proposed Second Amended Complaint, which slightly modifies paragraph 16. The paragraph currently reads:


Amazon stated it was not interested in acquiring GateGuard because it was much easier to simply copy the Property Panel after it had illegally obtained one of GateGuard’s devices through an alleged “client” of GateGuard. *See* ¶¶ 135-140s *infra*.

Plaintiff proposes to amend the paragraph as follows (with the proposed changes in red):

Amazon stated it was not interested in acquiring GateGuard—**presumably** because it **would be** much easier to simply copy the Property Panel after it had illegally obtained one of GateGuard’s devices through an alleged “client” of GateGuard. *See* ¶¶ 135-140s *infra*.

Plaintiff respectfully requests permission to make the above minor changes to paragraph 16 and file the attached proposed SAC, which reflects these slight edits. Plaintiff has conferred with Defendants, who do not oppose the present request.

Respectfully submitted,

  
Eden P. Quainton

cc: All counsel of record (via ECF)

**MEMO ENDORSED**



HON. VALERIE FIGUEREDO  
UNITED STATES MAGISTRATE JUDGE

DATED: August 14, 2024

Plaintiff's request to make the minor changes to the Second Amended Complaint is granted. The Clerk of Court is respectfully directed to terminate the motion at ECF No. 219.